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January 14, 2024

Hon. Judge David H. Hennessy  
Senior U.S. District Judge  
Harold D. Donohue Federal Building and U.S. Courthouse  
595 Main Street  
Worcester, Massachusetts 01608

Re:

United States v. Paul Bateman 1:20-cr-10012  
**19-mj-4539**

Dear Judge Hennessy:

This letter is respectfully submitted as a request that the search warrant cases ( [REDACTED] 19-mj-4539) in the above-referenced criminal matters be unsealed.

As an American-born citizen, and a member of the public, I have standing to request the unsealing of these documents due to a direct interest in the integrity of public records and proceedings. This request is grounded in the established right of public access to judicial records and documents, as affirmed by the United States Supreme Court. In landmark cases such as *Richmond Newspapers, Inc. v. Virginia*, 448 U.S. 555 (1980) and *Press-Enterprise Co. v. Superior Court*, 478 U.S. 1 (1986), the Supreme Court upheld the principle that openness in judicial proceedings is crucial for maintaining the integrity and fairness of the judicial system. These decisions underscore the importance of transparency, particularly in criminal proceedings, where public scrutiny serves as a significant check on the judicial process. Further, under the First Amendment, documents may be sealed only if there are “overriding interests” requiring secrecy, and only if the proposed sealing order is effective and narrowly tailored to serve those interests.

In accordance with these principles, I believe that the unsealing of the aforementioned case and documents is essential to ensure public confidence in the judicial process and to uphold the democratic principles of transparency and accountability. Therefore, on behalf of the American public, which has a constitutional “right of access to criminal proceedings and documents filed therein,” *CBS, Inc. v. U.S. Dist. Court*, 765 F.2d 823,825 (9th Circuit, 1985) I would like to respectfully request that any and all magistrate cases of criminal complaints and search warrants cases related to the criminal matters and the magistrate cases (20-mj-4234, 19-mj-4539) and their associated judicial records, be unsealed and made available to the public.

I've also reviewed the local rules for the District of Massachusetts (RULE 83.6.11 PUBLIC ACCESS AND CONFIDENTIALITY), which states that in reference to Grand Jury or Criminal Investigations, "Any matters reasonably necessary to protect information subject to grand jury secrecy or to protect an ongoing criminal investigation" may be redacted or filed under seal. However, I do not believe these cases are part of an ongoing investigation, as I have found, in researching cases of the same nature, that many are already unsealed. Please see some examples below (additional can be provided if need be).

<b>Case #</b>	<b>District</b>
5:20-mj-00044	Northern District of Florida
1:20-MJ-00481	Western District of Michigan
2:20-mj-00143-kjd	District of Vermont
4:20-mj-03301	Eastern District of Missouri
1:20-MJ-00255	District of Maine
1:20-mj-00243-LPA	Middle District of North Carolina
1:21-mj-00148, 1:21-MJ-00146	District of New Hampshire
4:20-mj-05049	Eastern District of Missouri
4:20-mj-07161	Eastern District of Missouri
4:20-mj-08007	Eastern District of Missouri
4:20-mj-08005	Eastern District of Missouri
1:20-mj-236	Middle District of North Carolina
1:20-mj-244	Middle District of North Carolina
1:20-cr-00335	Northern District of New York

Much of the information contained in these documents is already in the public eye, as referenced in the cases above or the associated criminal matter.

Courts nationwide acknowledge a general right for the public to inspect and copy public records, including judicial records and documents. Further, they acknowledge that the burden of proving the necessity of sealing court records generally falls on the party proposing the sealing - in this case the Government. There is no compelling reason to continue sealing the magistrate search warrant cases or their associated documents. In the Delaney case (1:20-cr-00335), the Judge unsealed numerous documents after two attorney's from the Department of Justice's Child

Exploitation and Obscenity Section (CEOS) admitted that there were no longer reasons to seal certain exhibits and other information.

I would appreciate it if the court would direct the Clerk to provide access to unredacted, or if necessary redacted versions, of the sealed documents in these search warrant cases (20-mj-4234, 19-mj-4539). If there are any additional fees or formal procedures required to process this request please let me know so that I can promptly comply with them.

Thank you for reviewing this letter.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert White". The signature is written in a cursive, flowing style.

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